

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

EDWARD C. LECKEY,

Debtor.

JEFFREY J. SIKIRICA,

Movant,

v.

EDWARD C. LECKEY,

Respondent.

Bankruptcy No. 19-22390-CMB

Chapter 7

Document No.

Related to Doc. No. 73

**Hearing Date and Time:
March 5, 2020 at 1:30 p.m.**

**RESPONSE TO MOTION TO COMPEL DEBTOR TO TURNOVER RECORDS OF THE
ESTATE PURSUANT TO 11 U.S.C. § 521(4)**

AND NOW, comes Edward C. Leckey, the Debtor in the above Chapter 7 Case, by and through his Counsel, Robert O Lampl, John P. Lacher, David L. Fuchs and Ryan J. Cooney, and files this **RESPONSE TO MOTION TO COMPEL DEBTOR TO TURNOVER RECORDS OF THE ESTATE PURSUANT TO 11 U.S.C. § 521(4)** as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The transcripts of the November 14, 2019 Deposition and the November 2019 §341 Meeting of Creditors speak for themselves. By way of further response, the Debtor submits that the questions regarding his wife's status at the §341 Meeting of Creditors were unclear and that to the extent his responses were inaccurate, said inaccuracies were unintentional. Additionally, the Debtor was clearly forthcoming at the November 14, 2019 deposition.

5. The Debtor acknowledges receipt of the November 21, 2019 letter, however, the undersigned inadvertently failed to calendar the need to respond and thus apologizes to the Trustee and the Court for not promptly preparing a response.

6. The Debtor has searched for the requested records. At this time, the Debtor represents the following:

- A. Mrs. Leckey died intestate;
- B. A list of Mrs. Leckey's assets is being prepared.
- C. Mrs. Leckey had no life insurance policies; and
- D. The Debtor has not located any paperwork associated with the purchase of the T.A. King paintings and the coin collection.

The Debtor is in the process of preparing a sworn affidavit regarding the above and will provide the same to the Trustee.

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order denying the Motion to Compel Debtor to Turnover Records of the Estate Pursuant to 11 U.S.C. § 521(4).

Respectfully Submitted,

Date: February 24, 2020

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
PA I.D. #205694
RYAN J. COONEY
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CERTIFICATE OF SERVICE

Robert O Lampl, John P. Lacher, David L. Fuchs and Ryan J. Cooney, hereby certify, that on the 24th day of February, 2020, a true and correct copy of the foregoing **RESPONSE TO MOTION TO COMPEL DEBTOR TO TURNOVER RECORDS OF THE ESTATE PURSUANT TO 11 U.S.C. § 521(4)** was served upon the following (via electronic service):

Jeffrey J. Sikirica
121 Northbrook Drive
Gibsonia, PA 15044
trusteesikirica@zoominternet.net

Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222
Larry.e.walquist@usdoj.gov

Date: February 24, 2020

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
PA I.D. #205694
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